

**From:** Steven Moser  
**Sent:** Thursday, December 21, 2023 3:49 PM  
**To:** glenn ingoglia  
**Subject:** Re: nieto barahona

Glen please send the updated pto with ur documents

Steven Moser  
MOSER LAW FIRM PC  
133C New York Ave  
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**From:** Steven Moser <steven.moser@moserlawfirm.com>  
**Sent:** Thursday, December 21, 2023 10:25:50 AM  
**To:** glenn ingoglia <glenn@ingoglialaw.com>  
**Subject:** Re: nieto barahona

Please send to me your proposed pto prior to submitting it to the court

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**From:** glenn ingoglia <glenn@ingoglialaw.com>  
**Sent:** Thursday, December 21, 2023 10:16:01 AM  
**To:** Steven Moser <steven.moser@moserlawfirm.com>  
**Cc:** glenn ingoglia <glenn@ingoglialaw.com>  
**Subject:** Re: nieto barahona

Correction to last email: first sentence should read "Again, you are not telling the truth."

Glenn J Ingoglia, Esq.  
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**From:** glenn ingoglia <glenn@ingoglialaw.com>  
**Sent:** Thursday, December 21, 2023 10:14:34 AM  
**To:** Steven Moser <steven.moser@moserlawfirm.com>  
**Cc:** glenn ingoglia <glenn@ingoglialaw.com>  
**Subject:** Re: nieto barahona

Dear Steve

Again, you are telling the truth. I sent you a draft yesterday at about 5pm. All you do is try to obstruct the process in hopes your case might grow legs. It is impossible to work jointly with you on anything as your intentional and ongoing misrepresentations to the court illustrate. At this point, I don't have the time to deal with your obstructionist tactics all day.

Therefore, even though it is against protocol, I shall submit my own PTO to the court and explain my reasons for doing so and hope the Court understands. I am preparing to celebrate a very special religious holiday for me and I will not sacrifice that because you feel like being difficult! Merry Christmas and Happy Holidays!

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**From:** Steven Moser <steven.moser@moserlawfirm.com>  
**Sent:** Wednesday, December 20, 2023 10:22:38 PM  
**To:** glenn ingoglia <glenn@ingoglialaw.com>  
**Subject:** RE: nieto barahona

Glenn

At this point its after 10 and I still don't have a revised PTO from you. The document you provided today at 5:20 PM does not track any of the extensive changes you made to the proposed PTO. Defendant has refused to stipulate to any fact other than that the plaintiffs were paid in cash, despite the fact that your client admitted to numerous facts which were cited for you from his deposition. This is due tomorrow. I have a motion due on Friday.

I suggest that you request an extension of 1 week, to which I will gladly consent, provided that your proposed PTO is furnished tomorrow.

Steve

**Steven J. Moser**  
Managing Attorney, Moser Law Firm, PC



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**From:** glenn ingoglia <glenn@ingoglialaw.com>  
**Sent:** Wednesday, December 20, 2023 5:21 PM  
**To:** Steven Moser <steven.moser@moserlawfirm.com>  
**Cc:** glenn ingoglia <glenn@ingoglialaw.com>  
**Subject:** nieto barahona

**Hello Steve**

**I revised your November PTO in the format listed in the Magistrate's rules on pages 14-15. The only part I need to go over is my exhibit list. I highlighted in yellow the parts that I do not believe should be in the PTO because that information is either not required or because you list statutes in the exhibit list which are not proper. You will not be admitting statutes as exhibits, they are in your claims.**

**Please return to me by tomorrow without redlines and without trying to gain a leg up. Lets get this done.**

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